

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Mail Processing Network  
Rationalization Service Changes, 2012

Docket No. N2012-1

PUBLIC REPRESENTATIVE'S FOURTH SET OF  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS ROSENBERG  
(PR/USPS-T-3: 29-32)

(March 13, 2012)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatory. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

This interrogatory is propounded for the purpose of developing intervenor testimony. The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

Public Representative for  
Docket No. N2012-1

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**PR/USPS-T-3-29**

Please refer to your testimony on page 21 where you state: "To estimate the cancelation AFCS requirement, Fiscal Year 2010 MODS data were used at the 75<sup>th</sup> percentile of volume. To estimate the DBCS requirement for the Outgoing Primary (OGP) processing for letters, Fiscal Year 2010 MODS data were used at the 95<sup>th</sup> percentile...." Please also refer to your response to APWU/USPS-T3-14 where you state: "the 95<sup>th</sup> percentile...represents the 14/15 highest volume day. There are other mitigating strategies to handle peak days and thus equipment sets are not planned for the highest day of the year."

- a. Please explain the rationale for choosing 75<sup>th</sup> percentile for AFCS requirement
- b. Please explain the rationale for choosing 95<sup>th</sup> percentile for DBCS requirement.
- c. Please provide, or refer to the workbook and worksheet containing, data for the daily volumes greater than the 75<sup>th</sup> percentile for AFCS, and daily volumes greater than the 95<sup>th</sup> percentile of DBCS.

**PR/USPS-T-3-30**

Please refer to page 18 of your testimony. You state that "equipment square footage (which includes space for aisles and staging) was inflated by an additional twenty percent to ensure there was adequate staging room under this new concept when all volume is available at the start of the windows."

- a. Please estimate the average share of equipment square footage that is currently devoted to staging.
- b. Please estimate the average share of equipment square footage that is currently devoted to non-staging purposes (for example, holding mail for future processing).

**PR/USPS-T-3-31**

Please identify all potential sources (for example, "originating mail that did not meet its clearance time) of mail that could require storage at a plant between the end of the last clearance time for outgoing primary sortation on day 0, and the beginning of their first sorting operation on day 1 or day 2 in the new network configuration.

**PR/USPS-T-3-32**

Please estimate the average and peak percent of equipment space that will be required for mail storage at the plant before the last mail must receive its first sort on day 1. Please provide the mean and peak percentages for each type of mail if available.